

UN Sealed 3/7/22

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
FILED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

NOV 10 2021

UNITED STATES OF AMERICA

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NATHAN OCHSNER
CLERK OF COURT

vs

CRIMINAL NO.

JOSE ALFREDO CARDENAS-MARTINEZ
aka El Contador

B-21-1011

Partially
UNSEALED 3-7-22
INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

Beginning on or about 2015 and continuing up to and including November 9, 2021
in the Southern District of Texas and elsewhere and within the jurisdiction of the Court,
Defendants,

JOSE ALFREDO CARDENAS-MARTINEZ aka El Contador,

did knowingly and intentionally agree, combine, conspire, and confederate with other
persons known and unknown to the Grand Jurors, to possess with intent to distribute a
controlled substance. The overall scope of the conspiracy involved fifty (50) grams or

more of methamphetamine, a Schedule II controlled substance; five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance; and four hundred (400) grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT TWO

Beginning on or about 2015 and continuing up to and including November 9, 2021, in the country of Mexico and elsewhere and within the jurisdiction of the Court, Defendants,

JOSE ALFREDO CARDENAS-MARTINEZ aka El Contador,

who will first enter the United States in the Southern District of Texas, did knowingly and intentionally conspire with other persons known and unknown to the Grand Jurors, to distribute and cause the distribution of fifty (50) grams or more of methamphetamine, a Schedule II controlled substance; five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance; and four hundred (400) grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance intending, knowing, and having reasonable cause to believe that such methamphetamine, cocaine and fentanyl would be unlawfully imported into the

United States.

In violation of Title 21, United States Code, Sections 959, 960, and 963.

COUNT THREE

On or about January 22, 2019 in the Southern District of Texas and within the jurisdiction of the Court, Defendants,

JOSE ALFREDO CARDENAS-MARTINEZ aka El Contador,

did knowingly and intentionally possess with intent to distribute a quantity of fifty (50) grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FOUR

On or about February 22, 2019 in the Southern District of Texas and within the jurisdiction of the Court, Defendants,

JOSE ALFREDO CARDENAS-MARTINEZ aka El Contador,

did knowingly and intentionally possess with intent to distribute a quantity of fifty (50) grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FIVE

On or about February 22, 2019, in the Southern District of Texas and within the jurisdiction of the Court, Defendants,

JOSE ALFREDO CARDENAS-MARTINEZ aka El Contador,

did knowingly and intentionally possess with intent to distribute a quantity of five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT SIX

On or about September 29, 2020, in the Southern District of Texas and within the jurisdiction of the Court, Defendants,

JOSE ALFREDO CARDENAS-MARTINEZ aka El Contador,

did knowingly and intentionally possess with intent to distribute a quantity of fifty (50) grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT SEVEN

On or about October 9, 2020, in the Southern District of Texas and within the jurisdiction of the Court, Defendants,

JOSE ALFREDO CARDENAS-MARTINEZ aka El Contador,

did knowingly and intentionally possess with intent to distribute a quantity of fifty (50) grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT EIGHT

On or about October 9, 2020, in the Southern District of Texas and within the jurisdiction of the Court, Defendants,

JOSE ALFREDO CARDENAS-MARTINEZ aka El Contador,

did knowingly and intentionally possess with intent to distribute a quantity of four hundred (400) grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT NINE

On or about March 29, 2021 in the Southern District of Texas and within the jurisdiction of the Court, Defendants,

JOSE ALFREDO CARDENAS-MARTINEZ aka El Contador,

did knowingly and intentionally possess with intent to distribute a quantity of fifty (50) grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

NOTICE OF CRIMINAL FORFEITURE
[Title 21, United States Code, Section 853]

Pursuant to Title 21, United States Code, Section 853, the United States gives notice to the Defendants, **JOSE ALFREDO CARDENAS-MARTINEZ aka El Contador,**

that in the event of a conviction for a violation of Title 21, United States Code, Sections 846 or 841, the following are subject to forfeiture:

- (1) all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses; and
- (2) all property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

MONEY JUDGMENT: SUBSTITUTE ASSETS

The United States may seek the imposition of a money judgment. In the event that a condition listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendant in substitution up to the total value of the property subject to forfeiture.

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

JENNIFER B. LOWERY
ACTING UNITED STATES ATTORNEY

Karen Betancourt

Karen Betancourt
Assistant United States Attorney